



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 Sixth Avenue, Suite 900
Seattle, Washington 98101-3140

JUN - 2 2015

OFFICE OF
COMPLIANCE AND ENFORCEMENT

Reply to: OCE-084

CERTIFIED MAIL -- RETURN RECEIPT REQUESTED

EPA WARNING LETTER

Mr. Tatuso Ito
Executive Vice President
SEH America, Inc.
P.O. Box 8965
Vancouver, Washington 98682

Re: Inspection of Risk Management Program (RMP)
EPA RMP Facility ID# 1000 0003 4946

Dear Mr. Ito:

On April 21, 2015, the U.S. Environmental Protection Agency (EPA) conducted an inspection of the SEH America, Inc. facility located at 4111 NE 112th Avenue, Vancouver, Washington. The purpose of the inspection was to evaluate compliance with Section 112(r) of the Clean Air Act also known as the Risk Management Program (RMP). The RMP inspection was conducted pursuant to the authorities under Section 112(r) and Section 114 of the Clean Air Act. Listed below are the areas of concern identified by EPA:

1. **Mechanical Integrity Requirement:** SEH America, Inc. failed to ensure the frequency of inspection and tests of process equipment is consistent with applicable manufacturers' recommendations, good engineering practices, and prior operating experience as required by 40 C.F.R. § 68.73(d)(3). SEH America, Inc. was unable to produce a written procedure defining the frequency of inspection and testing for process equipment for the hydrogen chloride (HCL) process.
2. **Mechanical Integrity Requirement:** SEH America, Inc. failed to document each inspection and test that had been performed on process equipment, which identifies the date of the inspection or test, the name of the person who performed the inspection or test, the serial number or other identifier of the equipment on which the inspection or test was performed, a description of the inspection or test performed, and the results of the inspection or test as required by 40 C.F.R. § 68.73(d)(4). SEH America, Inc. was unable to produce inspection and testing records for process equipment for the hydrogen chloride (HCL) process.
3. **Compliance Audits Requirement:** SEH America, Inc. failed to certify that the stationary source has evaluated compliance with the provisions of the prevention program at least every three years to verify that the developed procedures and practices are adequate and being followed as required by 40 CFR 68.79(a). During the inspection, the EPA inspectors observed that SEH America, Inc. has completed their 2009 and 2012 compliance audits at least every three years, but did not sign their compliance audit reports to certify the compliance evaluation reports.

Please provide the documentation to substantiate that the areas of concern listed above have been corrected. A copy of the documents must be sent to Javier Morales, RMP Coordinator, within 14 days of your receipt of this letter. The documents may be sent via e-mail, fax or mail.

Javier Morales, RMP Coordinator
U.S. EPA Region 10
1200 Sixth Avenue, Suite 900, OCE-084
Seattle, WA 98101
Fax: (206) 553-0124

Please refer to the document *General Risk Management Program Guidance* for additional information pertaining to the areas of concern addressed above. This guidance document can be found on EPA's website at:

http://www.epa.gov/emergencies/content/rmp/rmp_guidance.htm#General

We urge you to take the steps necessary to address these concerns and to ensure that all aspects of your operation are conducted in accordance with all applicable federal, state, and local requirements. If in the future, additional violations are identified and/or corrections to the identified concerns are not made, EPA may proceed with enforcement action. If you have any questions about the inspection or the Risk Management Program, please contact Javier Morales, RMP Coordinator, at (206) 553-1255 or morales.javier@epa.gov.

Sincerely,

A handwritten signature in blue ink, appearing to read "Kelly McFadden", is written over the typed name.

Kelly McFadden, Manager
Pesticides and Toxics Unit